

TRACKED D Response to Claim

NUFARM AMERICAS INC.

150 Harvester Drive, Suite 200 Burr Ridge, IL 60527

Phone: 630-455-2000 ■ Fax: 630-455-2001

#### **FEBRUARY 1, 2011**

Document Processing Desk (DCI/PRD) Russell Wasern Office of Pesticide Programs (7508P) US Environmental Protection Agency 2775 South Crystal Drive Arlington, VA 22202-4501

NOVEMBER 10, 2010 GENERIC DATA CALL-IN NOTICE ID# RR-129099-30160 IMIDACLOPRID

Dear Mr. Wasern

Please find enclosed 90-day response to subject DCI for Nufarm Inc (71368) & Nufarm Americas Inc. (228)

Thank you and kind regards,

Nathan P. Ehresman

Director, Regulatory Affairs Nufarm Americas, Inc.



OMB Approval 2070-0174

OMB Approval 2070-0107 OMB Approval 2070-0057

## DATA CALL-IN RESPONSE

INSTRUCTIONS: Please type Use additional sheet(s) if nece	or print in ink. Please ssary.	e read carefully t	the attached instruction	ns and supply the information request	ted on this form.		
Company Name and Addres     NUFARM, INC.     150 HARVESTER DRIV     BURR RIDGE, IL 6052	E SUITE 200		Case # and Nam     Chemical # and     Imidacloprid	ne Name 129099		Pate and Type of DCI and 10-Nov-2010 GENERIC ID# RR-129099-30	
4. EPA	5. I wish to	6. Generic D	Data		7. Product Sp	ecific Data	
Product Registration	cancel this product regis- tration volun- tarily	Data Exemobtain the so	laiming a Generic  ption because I  active ingredient  burce EPA regis- aber listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	I agree to sat requirements	uct is an MUP and tisfy the MUP s on the attached "Requirements Registrant's	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
71368-61					*	N.A.	N.A.
8. Certification I certify that knowingly false or misleading	the statements made statement may be pur	on this form and	all attachments are tr imprisonment or both	rue, accurate, and complete. I acknow under applicable law.	vledge that any	9. Date	
Signature and Title of Compar		- 1	011	Accentor Regulatory AH	farry		•
		Inc.				11. Phone Number	919-655-0018

OMB Approval 2070-0174

OMB Approval 2070-0107 OMB Approval 2070-0057

Guideline Requirement Number	5. Study Title						Taken to the control of	GENERIC ID # RR-129099-30160		
			P R O T O C		ogress eports		6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrar Response
			O L	1.	2	3				
-	Environmental Fate Data Requirements (C	Conventional								
835.4300	Aerobic aquatic metabolism						H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TGAI or PAIRA	24	3
1-	Nontarget Plant Protection Data Requiren Chemical)	nents (Conventional						All and the latest		
850.4100	Terrestrial plant toxicity, Tier 1 (seeding eme	ergence) (5,10)	Н		Н		H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
850.4150	Ferrestrial plant toxicity, Tier 1 (vegetative vi	gor) (3 ,11 ,12)		H	H		H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
	Aquatic plant toxicity test using Lemna spp. and II	Tiers I (4)				-	H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP or TGAI	12	3
-	Post-Application Exposure Data Requirent Chemical)	nents (Conventional								
	ndoor surface residue dissipation	(1, 13, 14)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	3
	Terrestrial and Aquatic Nontarget Organis Requirements (Conventional Chemical)	sms Data	61							The Case
850.3040	Field testing for pollinators	(2 ,15)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	24	3
	Foxicology Data Requirements (Conventi	onal Chemical)						MERCEN LEADIN	100	
870.7800	mmunotoxicity						H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TGAI	12	

OMB Approval 2070-0174

OMB Approval 2070-0107 OMB Approval 2070-0057

<ol> <li>Company Name ar NUFARM, INC.</li> <li>150 HARVESTE BURR RIDGE, I</li> </ol>	R DRIVE SUITE 2	000	2. Case # and N Chemical # a Imidaclopric	nd Name		12909	9		3.	Date and Type of DCI 10-Nov-2010 GENERIC ID# RR-129099-3		
Guideline Requirement Number	5. Study Tit	le	34		P R O T O C	Prog Rep	ress orts	6. Use Pattern		7. Test Substance	8. Time Frame (Months)	9. Registrant Response
de la companya de la				1 4	L	1 2	3					
Special Study	Residue Anal Crops	ysis of Nectar and Poller	n in Flowering (7,	3 ,9 ,17)				H, R, U, BB, I, K, I A, B, C, J, T, S	I, Q,	TEP	48	3
Special Study	Seed Leachin	ng Study Using TEP	(6,	16)				H, R, U, BB, I, K, I A, B, C, J, T, S	I, Q,	TEP	12	3
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OMB Approval 2070-0107 OMB Approval 2070-0057

#### DATA CALL-IN RESPONSE

INSTRUCTIONS: Please type	or print in ink. Pleas	e read carefully t	he attached instruction	ons and supply the information requeste	ed on this	form.	
Use additional sheet(s) if neces					pue		
Company Name and Addre     NUFARM AMERICAS IN     150 HARVESTER DRIV     BURR RIDGE, IL 6052	IC. E, SUITE 200		Case # and Nam     Chemical # and     Imidacloprid	ne Name 129099		Date and Type of DCI a     10-Nov-2010     GENERIC     ID # RR-129099-3	
4. EPA	5. I wish to	6. Generic D	ata		7. Prod	uct Specific Data	
Product Registration	cancel this product regis- tration volun- tarily	Data Exemobtain the a from the so	laiming a Generic ption because I active ingredient ource EPA regis- ber listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	l agree require form e	y product is an MUP and to satisfy the MUP ements on the attached ntitled "Requirements and Registrant's nse."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
228-512	- HOLDE	7131	68 - 61		UI-T	N.A.	N.A.
						•	
knowingly false or misleading s	statement may be pur	nishable by fine,	imprisonment or both				anuary 05, 2011
Signature and Title of Compan		rmerica.		Princeter Regulatory A	110173		1 919 - 655 - 0018
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OMB Approval 2070-0107 OMB Approval 2070-0057

INSTRUCTIONS: Ple Use additional sheet(	ease type or print in ink. Please read carefully to s) if necessary.	ne attached instructions and	supply	the	inform	ation requested on this form	n.	Notes to other been produced to	en cultivarit
1. Company Name a NUFARM AME 150 HARVEST BURR RIDGE,	RICAS INC. ER DRIVE, SUITE 200	Case # and Name     Chemical # and Name     Imidacloprid	1:	290	99	arcall box a set () ()	3. Date and Type of DCI a 10-Nov-2010 GENERIC ID # RR-129099-301		Control Street
Guideline Requirement Number	5. Study Title	464 E	P R O T O C		gress ports	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registran Response
			C .	1	2 3				
	Environmental Fate Data Requirement	nts (Conventional							
835.4300	Aerobic aquatic metabolism		1	+	1	H, R, U, BB, I, K, II, Q A, B, C, J, T, S	, TGAI or PAIRA	24	dang pang
	Nontarget Plant Protection Data Reg Chemical)	uirements (Conventional					All her market		To a second
850.4100	Terrestrial plant toxicity, Tier 1 (seeding	emergence) (5,10)	Ш			H, R, U, BB, LK, II, Q A, B, C, J, T, S	, TEP	12	
850.4150	Terrestrial plant toxicity, Tier 1 (vegetation	ve vigor) (3 ,11 ,12)	H			H, R, U, BB, I, K, II, Q A, B, C, J, T, S	TEP	12	
850.4400	Aquatic plant toxicity test using Lemna and II	spp. Tiers I (4)	П			H, R, U, BB, I, K, II, Q A, B, C, J, T, S	TEP OF TGAI	12	
i Granda	Post-Application Exposure Data Req Chemical)	uirements (Conventional							1 2 2 2 2
875.2300	Indoor surface residue dissipation	(1, 13, 14)				H, R, U, BB, I, K, II, Q A, B, C, J, T, S	, TEP	18	
	Terrestrial and Aquatic Nontarget On Requirements (Conventional Chemic								
850.3040	Field testing for pollinators	(2 ,15)				H, R, U, BB, I, K, II, Q A, B, C, J, T, S	, TEP	24	
	Toxicology Data Requirements (Conv	ventional Chemical)							N COLUMN
870.7800	Immunotoxicity					H, R, U, BB, I, K, II, Q A, B, C, J, T, S	, TGAI	12	
knowingly false or mi	certify that the statements made on this form an sleading statement may be punishable by fine, i					olete. I acknowledge that a	ny 11. Date		
Signature and Title of 12. Name of Compar	f Company's Authorized Representative						13. Phone Number	Land State Co. N. S.	
12. Harrie of Compa	,						15. I fiolic Halliber		

OMB Approval 2070-0174

OMB Approval 2070-0107 OMB Approval 2070-0057

INSTRUCTIONS: Pleas Use additional sheet(s)	ase type or print in ink. Please read carefully to if necessary.	the attached instructions and s	upply the	informa	tion requested on this form.	ruferist care eace	19. Tant in 19.	ette if necessary	SHOTTOWN a
1. Company Name and NUFARM AMERI 150 HARVESTER BURR RIDGE, IL	ICAS INC. R DRIVE, SUITE 200	Case # and Name     Chemical # and Name     Imidacloprid	1290	99	3. Case & and Name Thankpur & and Nam Insidactoprid	Date and Type of 10-Nov-2010 GENERIC ID # RR-1290		umber	Company (Someon Andrews Andrew
Guideline Requirement Number	5. Study Title	remarks (	O Rep	gress ports	6. Use Pattern	7. Test Substance	eth T visu	8. Time Frame (Months)	9. Registrant Response
			0	2 3					
Special Study	Residue Analysis of Nectar and Pollen Crops	in Flowering (7 ,8 ,9 ,17)			H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP		48	4300
Special Study	Seed Leaching Study Using TEP	(6,16)			H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP		12	
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Initial to indicate certification is	cation as to information on this page is on page one).					Date	in periodica	Sunda Sea America Company	Mame of Com



EPA Form 8570-32 (12-2003)

# United States Environmental Protection Agency Washington, D.C. 20460 CERTIFICATION OF ATTEMPT TO ENTER INTO AN AGREEMENT WITH REGISTRANTS FOR

**DEVELOPMENT OF DATA** 

Form Approved.

OMB Nos. 2070-0057; 2070-0107; 2070-0122; 2070-0164

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 15 minutes per response including time for reading the instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

Please fill in blanks below	
Company Name	Company Number
Nufarm Inc	7/368
Chemical Name	EPA Chemical Number
Imida cloprid	129 099
I Certify that:	Ψ.
My company is willing to develop and submit the data required by EPA under the authority Rodenticide and Fungicide Act (FIFRA), if necessary. However, my company would prefe with one or more registrants to develop jointly or share in the cost of developing data.	
My firm has offered in writing to enter into such an agreement. That offer was irrevocable bound by arbitration under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms c otherwise. This offer was made to the following firm(s) on the following date(s):	
Name of Firm(s)	Date of Offer
See Attached List	2/1/11
Certification:	
I certify that I am duly authorized to represent the company name above, and that the stat this form and all attachments therein are true, accurate and complete. I acknowledge that misleading statement may be punishable by fine or imprisonment or both under applicable	t any knowingly false or
Signature of Company's Authorized Representative	2/1/11
Name and Title (Please Print or Type)	
Nathan P. Ehresman / Dicector.	Booulators Affairs

## LIST OF ALL REGISTRANTS SENT THIS DATA CALL-IN NOTICE

#### Case # and Name:

Co. Nr.	Company Name	Agent For	Address	City & State	Zip
132	BAYER ENVIRONMENTAL SCIENCE		PO Box 12014 2 T. W. ALEXANDER DRIVE	RESEARCH TRIANGLE PARK	NC 27709
39967	LANXESS CORPORATION		111 RIDC PARK WEST DRIVE	PITTSBURGH	PA 152751112
33558	CELSIUS PROPERTY B.V., AMSTERDAM (NL)	MANA, INC	4515 FALLS OF NEUSE RD., SUITE 300	RALEIGH	NC 27609
70506	UNITED PHOSPHORUS, INC		630 FREEDOM BUSINESS CENTER, SUITE 402	KING OF PRUSSIA	PA 19406
71368	NUFARM, INC.	avera	150 HARVESTER DRIVE SUITE 200	BURR RIDGE	IL 60527
228	NUFARM AMERICAS INC.		150 HARVESTER DRIVE, SUITE 200	BURR RIDGE	IL 60527
264	BAYER CROPSCIENCE LP		PO Box 12014 2 T.W. ALEXANDER DRIVE	RESEARCH TRIANGLE PARK	NC 27709
34456	HEBEI VEYONG BIO-CHEMICAL CO., LTD.	WAGNER REGULATORY ASSOCIATES, INC.	PO Box 640 7460 LANCASTER PIKE, SUITE 9	HOCKESSIN	DE 19707064
33070	ADVAN LLC		2520 MERIDIAN PKWY., SUITE 525	DURHAM	NC 27713
33851	AMTIDE, LLC		21 HUBBLE	IRVINE	CA 92618
12750	ALBAUGH INC		1525 NE 36TH STREET	ANKENY	IA 50021
3883	CONTROL SOLUTIONS, INC.	D. O'SHAUGHNESSY CONSULTING, INC.	427 HIDE AWAY CIRCLE	CUB RUN	KY 42729
31598	ROTAM LIMITED	IPM RESOURCES LLC	4032 CROCKERS LAKE BLVD., STE 818	SARASOTA	FL 43238
32542	SOURCE DYNAMICS, LLC		10039 E. TROON NORTH DRIVE	SCOTTSDALE	AZ 85262
32633	SHARDA WORLDWIDE EXPORTS PVT. LTD.	WAGNER REGULATORY ASSOCIATES, INC.	7460 LANCASTER PIKE, SUITE 9	HOCKESSIN	DE 19707064
32957	ENSYSTEX III, INC.	PYXIS REGULATORY CONSULTING, INC.	4110 136TH ST., NW	GIG HARBOR	WA 98332